

**BNFL, Inc.**  
**MALCOLM BOLTON**  
**PAGE 1 OF 1**

This is Malcolm Bolton at BNFL, Inc., Fairfax office. My telephone number is (703) 385-7100, extension 7211. I was checking on the status of the final EIS and Record of Decision for the plutonium disposition. It shows on the schedule as early 1999, I wondered if you firmed up on this date yet. Thank you very much. Bye.

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PR002

**PR002-1**

**General SPD EIS and NEPA Process**

The SPD Final EIS will be published in November 1999. Availability of the SPD EIS ROD will be announced in the Federal Register no sooner than 30 days after the publication of this EIS.

# CONCERNED CITIZENS OF LOUISA COUNTY

JERRY ROSENTHAL

PAGE 1 OF 4

## STATEMENT ON MOX FROM THE CONCERNED CITIZENS OF LOUISA COUNTY

*CCLC has had*  
The Concerned Citizens of Louisa County (CCLC) is a two decade old, non-profit all-volunteer group interested, involved and active with energy and environmental issues in and around Louisa County, Virginia, with an ongoing involvement in all issues with the North Anna Nuclear Power Station (NAPS) including worker and community health, high and low level radioactive waste storage, air and water monitoring, plant operations, transportation, security, decommissioning, and tax and fiscal issues.

The CCLC is adamantly opposed to the proposed use of MOX at North Anna. We have carefully studied the proposal, discussed this matter with many people, including the technical staff of Virginia Power, and concluded that the use of MOX poses significant risks without real rewards, and that the stated "benefits" of the use of MOX can more easily, economically and safely be accomplished by other means.

*First of all*  
The involvement and entanglement of the Russians in the whole program poses a whole range of risks and questions. The fact that they plan to use some of the MOX in breeder reactors eliminates the entire argument that this program is aimed at reduction of plutonium and nuclear waste. The reliability of Russia as a partner in the MOX program is highly questionable as the Russian nuclear bureaucracy is committed publicly to any and every expansion of nuclear power and a plutonium-based energy future.

*Secondly*  
There are real concerns that this program mixes military and civilian uses of nuclear technology and brings up several non-proliferation issues. If the US advances this program, many nations will feel comfortable in mixing their programs -- nations such as Iran, Iraq, Pakistan, India, and North Korea -- leading to difficulty in monitoring and questions as to the use of each and every facility. We do not want North Anna considered a military target, or under the auspices of the DOE or DOD.

There is a better way to dispose of the nuclear warheads -- removing the pits, mixing with high level wastes, and then glassifying or vitrifying the resultant wastes, and placing them in monitored storage until permanent storage can be arranged. Not doing MOX will not affect the necessary programs to dismantle the warheads and render the plutonium unusable.

The use of military plutonium has not been done before in MOX programs. There are technical questions on contamination with gallium, for example. This program entails real risks with different temperatures in the operations and storage, different by-products and gasses, etc. What about MOX in the storage pool, in the dry casks? What about MOX's effects in the event of a release? Too many questions with too few specific answers.

The availability of this plutonium at the plant increases the risks of theft, terrorists or other security problems. The threat is real, which is why military transport is proposed.

Virginia Power, a member of the consortium proposing to use the MOX, previously wrote to the CCLC and the Louisa County Board of Supervisors that they would not use MOX at North Anna. Their reasons were that they wanted to concentrate on safety and economy, and felt that the attention to MOX would divert them from those goals. What has changed? Further, based on NAPS current licence, they will not have time to burn the MOX they have committed to take under this program. It is highly inappropriate to approve this before they have an extension from the NRC, and if they start this program, it would change their entire stream and moot any generic extension they may apply for.

For these reasons and more, the CCLC and many of the people around Lake Anna and in Louisa and surrounding counties, oppose the use of MOX at North Anna and elsewhere.

JERRY ROSENTHAL, PRESIDENT  
CONCERNED CITIZENS OF LOUISA COUNTY  
877 HOLLAND CREEK ROAD  
LOUISA, VIRGINIA 22095

DCR007

## DCR007-1

## MOX Approach

DOE acknowledges the commentor's opposition to the MOX approach. DOE has identified as its preferred alternative the hybrid approach. As shown in the cost report, *Cost Analysis in Support of Site Selection for Surplus Weapons-Usable Plutonium Disposition* (DOE/MD-0009, July 1998), it is expected that the hybrid approach, which includes both immobilization and MOX fuel, would be more expensive than the immobilization-only approach. However, pursuing both immobilization and MOX fuel fabrication provides the United States important insurance against potential disadvantages of implementing either approach by itself. The hybrid approach also provides the best opportunity for U.S. leadership in working with Russia to implement similar options for reducing Russia's excess plutonium in parallel. Further, it sends the strongest possible signal to the world of U.S. determination to reduce stockpiles of surplus plutonium as quickly as possible and in a manner that would make it technically difficult to use the plutonium in nuclear weapons again.

The environmental, safety and health consequences of the MOX approach in the proposed reactors are addressed in Section 4.28. In addition, NRC would evaluate license applications and monitor the operations of both the MOX facility and domestic, commercial reactors selected to use MOX fuel, to ensure adequate margins of safety.

## DCR007-2

## Nonproliferation

DOE acknowledges the commentor's concern regarding the reliability of Russia. The *Joint Statement of Principles* signed by Presidents Clinton and Yeltsin in September 1998 provide general guidance for achieving the objectives of a future bilateral agreement to disposition surplus plutonium in the United States and Russia. Sensitive negotiations between the two countries have indicated that the Russian government accepts the technology of immobilization for low-concentration, plutonium-bearing materials, but that the MOX approach would be considered for higher-purity feed materials. DOE will continue to discourage Russia from reprocessing its spent nuclear fuel and starting a plutonium cycle but this issue is beyond the scope of this SPD EIS.

**DCR007–3**

**MOX Approach**

The goal of the surplus plutonium disposition program is to reduce the threat of nuclear weapons proliferation worldwide by conducting disposition of surplus plutonium in the United States in an environmentally safe and timely manner. Converting the surplus plutonium into MOX fuel and using it in domestic, commercial reactors is an effective way to accomplish this. The physical protection, safeguards, and security for the MOX facility and domestic, commercial reactors, including North Anna, would be in compliance with NRC regulations. North Anna would continue to be operated by Virginia Power Company with oversight by NRC, not DoD or DOE.

As discussed in Section 2.4, there are provisions for international inspections of each of the proposed surplus plutonium disposition facilities. International monitoring and inspection of the unclassified plutonium would also allow the United States to demonstrate to the world, including Russia, Iran, Iraq, Pakistan, India, and North Korea, that disposition is being carried out under stringent nonproliferation controls, and that the excess plutonium is not being diverted for reuse in weapons.

**DCR007–4**

**Immobilization**

DOE acknowledges the commentor's support of the immobilization approach. As discussed in response DCR007–1, DOE has identified as its preferred alternative the hybrid approach.

**DCR007–5**

**MOX Approach**

Although surplus weapons-usable plutonium has never before been used to manufacture commercial MOX fuel, much research and development has been performed to ensure that weapons-usable plutonium can be safely converted into MOX fuel. The proposed lead assemblies testing program may be used to verify the behavior of MOX fuel in commercial LWRs before full-scale production is initiated. The extent of this program would be determined based on discussions between DCS, DOE, and NRC, should the decision be made in the SPD EIS ROD to go forward with the MOX approach.

On the basis of public comments received on the SPD Draft EIS, and the analysis performed as part of the MOX procurement, DOE has included

plutonium polishing as a component of the MOX facility to ensure adequate impurity removal (including gallium) from the plutonium dioxide. Appendix N was deleted from the SPD Final EIS, and the impacts discussed therein were added to the impacts sections presented for the MOX facility in Chapter 4 of Volume I. Section 2.18.3 was also revised to include the impacts associated with plutonium polishing.

Although there would be some differences in core physics between partial MOX and LEU fuel cores, these differences are known. For example, studies indicate that partial MOX fuel cores have a more negative fuel Doppler coefficient at hot zero power and hot full power, relative to LEU fuel cores for all times during the full cycle. These evaluations also indicate that partial MOX cores have a more negative moderator coefficient at hot zero power and hot full power, relative to LEU fuel cores for all times during the full cycle. These more negative temperature coefficients would act to shut the reactor down more rapidly during a heat-up transient.

The DCS team reactor utility companies use a typical 18-month fuel cycle, replacing approximately 40 percent of the fuel assemblies in a reactor at each refueling. Some fuel assemblies are used for two cycles, some for three cycles. The utilities plan to maintain the current fuel management schemes and would use the MOX fuel assemblies for only two cycles.

Initially, when spent fuel is removed from the reactor, the MOX and LEU fuel would be about the same temperature and exhibit similar characteristics. After about a year out of the reactor, however, the temperature of MOX spent fuel would exceed that of LEU fuel of the same age. Therefore, storage of MOX spent fuel would increase the thermal loading in a spent fuel pool over that for only LEU fuel. However, thermal load limitations are based on the amount of cooling that the entire spent fuel pool can accommodate, not on individual fuel assemblies within the pool. Therefore, the additional heat load would be accounted for in the calculations for the reactor spent fuel management plans. This SPD EIS analyzed several reactor accidents in Section 4.28, including both design basis and beyond-design-basis accidents. For MOX fuel, as compared to LEU fuel, there is an increase in risk, about 3 percent, for the large-break loss-of-coolant accident (the bounding design basis accident). The largest increase in risk for beyond-design-basis accidents

is approximately 14 percent for an interfacing systems loss-of-coolant accident at North Anna. In the unlikely event this beyond-design-basis accident were to occur, the expected number of LCFs would increase from 2,980 to 3,390 with a partial MOX core and prompt fatalities would increase from 54 to 60. Both of these accidents have an extremely low probability of occurrence. At North Anna, the likelihood of a large-break loss-of-coolant accident occurring is 1 chance in 48,000 per year and the likelihood of an interfacing systems loss-of-coolant accident occurring is 1 chance in 4.2 million per year.

**DCR007-6**

**MOXRFP**

DOE cannot speak for Virginia Power's motivation for agreeing to use MOX fuel. It is anticipated that the North Anna reactors would be able to use MOX fuel for a number of years under their current license. The participation of North Anna under the MOX approach is therefore not dependent on the reactors being granted a license extension.

Dear Secretary Richardson,

I am writing to urge you to hold formal public hearings on MOX, or Mixed Oxide nuclear power fuel, a mixture of uranium and plutonium.

Plutonium is a highly toxic element. It is used in bombs because of its explosive power. Commercial nuclear power reactors were designed to use uranium fuel, not plutonium. MOX fuel will accelerate the aging of reactors, internal parts, and increase the risk of accident. Plutonium in MOX fuel makes a reactor accident more dangerous to human health. MOX reverses the U.S. policy banning plutonium-fueled power reactors.

Citizens have the rights to know about the risks and costs of a plutonium fuel economy and MOX. Again, I urge you to hold public hearings on this urgent issue.

Sincerely,  
Alex LoCascio  
104 W. Churchill Drive  
Lynchburg, VA  
24502

MR021

#### MR021-1

#### General SPD EIS and NEPA Process

DOE acknowledges the commentor's request for public hearings on the MOX approach. As shown in Volume III, Chapter 1, DOE held five public hearings during the 60-day public comment period on the SPD Draft EIS. Another public hearing was held during the 45-day period for public comment on the *Supplement to the SPD Draft EIS*. DOE also accepted comments submitted by various other means: mail, a toll-free telephone and fax line, and the MD Web site. The various channels of communication were open to all interested individuals and organizations for both the comment periods, and provided for regional and nationwide comment on both the EIS and *Supplement*. All comments were given equal consideration and responded to.

After careful consideration of its public involvement opportunities, including the availability of information and mechanisms to submit comments, DOE decided not to hold additional hearings on the *Supplement*. As noted above, DOE provided other means for the public to express their concerns and provide comments. Also, at the invitation of South Carolina State Senator Phil Leventis, DOE attended and participated in a public hearing held on June 24, 1999, in Columbia, South Carolina.

The *Supplement* was mailed to those stakeholders who requested it as well as to those specified in the DOE *Communications Plan* (i.e., Congressional representatives, State and local officials and agencies, and public interest groups around the United States) and the utilities' contact lists. The utilities, Duke Power Company and Virginia Power Company, would operate the proposed reactors (located in North Carolina, South Carolina, and Virginia) should the MOX approach be pursued per the SPD EIS ROD. Further, interested parties would likely have the opportunity to submit additional comments during the NRC reactor license amendment process.

#### MR021-2

#### MOX Approach

Although no U.S. commercial reactors are licensed to use plutonium-based fuel, several are designed to use MOX fuel, and others can easily and safely accommodate a partial MOX core. These commercial reactors are capable of safely using MOX fuel. Section 4.28 was revised to discuss the environmental impacts of operating the reactors that would use MOX fuel.

**MR021-3**

**Facility Accidents**

This SPD EIS analyzed several reactor accidents including both design basis and beyond-design-basis accidents. For MOX fuel, as compared to LEU fuel, there is an increase in risk, about 3 percent, for the large-break loss-of-coolant accident (the bounding design basis accident). The largest increase in risk for beyond-design-basis accidents is approximately 14 percent for an interfacing systems loss-of-coolant accident at North Anna. In the unlikely event this beyond-design-basis accident were to occur, the expected number of LCFs would increase from 2,980 to 3,390 with a partial MOX core and prompt fatalities would increase from 54 to 60. Both of these accidents have an extremely low probability of occurrence. At North Anna, the likelihood of a large-break loss-of-coolant accident occurring is 1 chance in 48,000 per year and the likelihood of an interfacing systems loss-of-coolant accident occurring is 1 chance in 4.2 million per year.

**MR021-4**

**DOE Policy**

Consistent with the U.S. policy of discouraging the civilian use of plutonium, a MOX facility would be built and operated subject to the following strict conditions: construction would take place at a secure DOE site, it would be owned by the U.S. Government, operations would be limited exclusively to the disposition of surplus plutonium, and the MOX facility would be shut down at the completion of the surplus plutonium disposition program. For reactor irradiation, the NRC license would authorize only the participating reactors to use MOX fuel fabricated from surplus plutonium, and the irradiation would be a once-through cycle with no reprocessing.

**VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY**  
**MICHAEL P. MURPHY**  
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**COMMONWEALTH of VIRGINIA**

**DEPARTMENT OF ENVIRONMENTAL QUALITY**

James S. Gilmore, III  
 Governor  
 John Paul Woodley, Jr.  
 Secretary of Natural Resources

Street address: 629 East Main Street, Richmond, Virginia 23219  
 Mailing address: P.O. Box 10009, Richmond, Virginia 23240  
 Fax (804) 698-4500 TDD (804) 698-4021  
<http://www.deq.state.va.us>  
 June 25, 1999

Dennis H. Treacy  
 Director  
 (804) 698-4000  
 1-800-592-5482

Ms. Laura S. H. Holgate, Director  
 Office of Fissile Materials Disposition  
 U. S. Department of Energy  
 P. O. Box 23786  
 Washington D. C. 20026-3786

RE: Supplement to the Draft Environmental Impact Statement for Surplus Plutonium  
 Disposal proposed by the Department of Energy; DEQ-99-049F.

Dear Ms. Holgate:

The Commonwealth of Virginia has completed its review of the Supplement to the Draft Environmental Impact Statement concerning Surplus Plutonium Disposition. The Department of Environmental Quality is responsible for coordinating Virginia's review of federal environmental documents and responding to appropriate federal officials on behalf of the Commonwealth. The following agencies took part in this review:

Department of Environmental Quality  
 Department of Transportation  
 Department of Emergency Services  
 Department of Mines, Minerals and Energy  
 Marine Resources Commission  
 Virginia Port Authority.

In addition, the Department of Health, Thomas Jefferson Planning District Commission, and Louisa County were also invited to comment.

The Supplement to the Draft EIS evaluates the potential environmental impacts of using mixed oxide (MOX) fuel in six specific reactors at three sites: Catawba in York County, South Carolina; McGuire in Mecklenburg County, North Carolina; and North Anna in Louisa County, Virginia. The supplement describes the impacts of using a partial MOX core instead of a low-enriched uranium (LEU) core in existing commercial light reactors. Each of the three sites proposed has two operating reactors that would be used to irradiate MOX fuel assemblies. The supplement also discusses changes that have been made to the program since issuance of the Draft EIS in 1998.

1

*An Agency of the Natural Resources Secretariat*

MR016

**MR016-1**

**Alternatives**

DOE acknowledges the State has no objection to the proposed actions provided those actions are in strict accordance with all applicable Federal, State, and local regulations. It is DOE policy to construct and operate the proposed surplus plutonium disposition facilities in compliance with all applicable water quality, air quality, and waste management requirements and to protect human health and the environment.



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The Draft EIS identified potential environmental impacts of reasonable alternatives for siting, construction, and operation of three facilities for plutonium disposition. None of the alternatives analyzed were located in Virginia.

The Commonwealth of Virginia has no objection to the proposed project provided it is carried out in strict accordance with all applicable federal, state, and local regulations. As stated in our September 15, 1998 response to the DEIS, the Department of Emergency Services, Brian Iverson at (804) 674-2400, and the appropriate localities should be notified prior to the transportation of hazardous materials to or through Virginia.

Environmental Impacts and Mitigation

According to the supplement to the DEIS (page 48), there will be no new construction at the reactor sites and emissions of effluent from the reactors would not change significantly from using MOX fuel instead of LEU fuel. Accordingly, the use of MOX in existing reactors would not affect land use, cultural and archaeological resources, geology and soils, and natural resources. The following comments are related to potential operational impacts.

1. *Water Quality.* According to the supplement to the DEIS (page 47), the use of MOX fuel would not change water usage or discharge of nonradiological pollutants. Discharge of nonradiological wastewater at North Anna Power Station must be in accordance with the Virginia Pollutant Discharge Elimination System permit issued by the Department of Environmental Quality. If any modifications of the existing permit is required, Virginia Power should contact DEQ's Valley Regional Office at (540)-574-7803.

2. *Air Quality.* The supplement to the DEIS (page 31) indicated that emissions of air pollutants resulting from operation of the reactors is not expected to increase due to the use of MOX fuel in the reactors. DEQ's Valley Regional Office should be notified of any changes in the current emissions, change in fuel used, manifestation of different pollutants, or installation of new equipment as a result of this project.

3. *Solid Waste and Hazardous Substances.* The supplement to the DEIS (page 31) states that wastes would continue to be handled in the same manner as they are today with no change required due to use of MOX fuel. In general, all solid wastes generated at the site should be reduced at the source, re-used, or recycled. Otherwise, solid waste, hazardous waste, and hazardous material must be managed in accordance with all applicable federal, state, and local environmental regulations.

Thank you for the opportunity to review the supplement to the Draft EIS for this undertaking. For clarification of these comments, contact Ellie Irons at (804) 698-4325.

MR016

**VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY**  
**MICHAEL P. MURPHY**  
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Ms. Laura S. H. Holgate  
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Comments submitted by reviewing agencies are attached.

Sincerely,



Michael P. Murphy, Director  
Division of Environmental Enhancement

Enclosures

cc. Thomas Ballou, DEQ-OADA  
Steve Frazier, OTAW  
Tom Mizell, DEQ-VRO  
Joseph Hassell, DEQ-OWP  
Tony Watkinson, VMRC  
Steven A. Walz, DMME  
Robert R. Merhige, III, VPA  
Kelly S. Coleman, VDOT  
Brian Iverson, DES  
Nancy O'Brien, Thomas Jefferson PDC  
Jeffrey Lundsford, Louisa County.

MR016

DEPARTMENT OF ENVIRONMENTAL QUALITY  
DIVISION OF AIR PROGRAM COORDINATION

DOCUMENT REVIEW CHECKLIST

TO: Ellie Irons

DATE: 6/23/99 DEQ-OEIA PROJECT NUMBER: 99-049F

\_\_\_ STATE EIR \_\_\_ FEDERAL EA/FONSI X FEDERAL EIS \_\_\_ GRANT/SCC

PROJECT TITLE: Surplus plutonium disposition - Department of Energy.

PROJECT DETAILS: Proposed siting, construction, and operation of three facilities for plutonium disposition (including one at the Virginia Power North Anna Nuclear Power Plant).

AIR PROGRAM COORDINATION DIVISION FINDINGS:

\_\_\_ CONCURS WITH THE FONSI \_\_\_ CONCURS WITH THE CONFORMITY FINDING

X SEE APPLICABLE REGULATORY REQUIREMENTS

THE PROJECT SITE IS LOCATED IN A:

\_\_\_ OZONE/CARBON MONOXIDE NONATTAINMENT AREA

\_\_\_ OZONE/CARBON MONOXIDE MAINTENANCE AREA

\_\_\_ STATE VOLATILE ORGANIC COMPOUND & NITROGEN OXIDES EMISSION CONTR OL (VOC/NO<sub>x</sub>/EC) AREA

REGULATORY REQUIREMENTS MAY APPLY TO:

X CONSTRUCTION \_\_\_ OPERATION

STATE AIR POLLUTION CONTROL BOARD REGULATIONS FOR THE CONTROL AND ABATEMENT OF AIR POLLUTION THAT MAY APPLY:


1. \_\_\_ 9 VAC 5-40-5200 C and 9 VAC 5-40-5220 E - Stage I.
2. \_\_\_ 9 VAC 5-40-5200 C and 9 VAC 5-40-5220 F - Stage II Vapor Recovery.
3. \_\_\_ 9 VAC 5-40-5490 et seq. - Cut-back Asphalt Usage Restriction.
4. X 9 VAC 5-40-5600 et seq. - Open Burning.

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5. ☒ 9 VAC 5-50-60 et seq. - Fugitive Dust Emissions.
6. ☐ 9 VAC 5-50-130 et seq. - Odorous Emissions; applicable to the \_\_\_\_\_.
7. ☐ 9 VAC 5-50-160 et seq. - Standards of Performance for Toxic Pollutants.
8. ☐ 9 VAC 5-50-400 Subpart \_\_\_\_\_, Standards of Performance for New Stationary Sources, designates standards of performance for the \_\_\_\_\_.
9. ☐ 9 VAC 5-80-10 et seq. of the regulations - Permits for Stationary Sources.
10. ☐ 9 VAC 5-80-1700 et seq. of the regulations - Major or Modified Sources located in PSD areas. This rule may be applicable to the \_\_\_\_\_.
11. ☐ VAC 5-80-2000 et seq. of the regulations - New and Modified Sources located in nonattainment areas. This rule may be applicable to the \_\_\_\_\_.
12. ☐ 9 VAC 5-80-800 et seq. of the regulations - Operating Permits and Exemptions. This rule may be applicable to the \_\_\_\_\_.

OTHER REQUIREMENTS (R) AND/OR CONSIDERATIONS (C):

PLEASE CONTACT THE \_\_\_\_\_ OFFICE FOR ANY TECHNICAL AND/OR PERMIT ASSISTANCE.

  
Thomas R. Ballou  
Technical Services Administrator

6-23-99  
Date

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY  
MICHAEL P. MURPHY  
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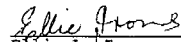
If you cannot meet the deadline, please notify ELLIE IRONS at 804/698-4325 prior to the date given. Arrangements will be made to extend the date for your review if possible. An agency will not be considered to have reviewed a document if no comments are received (or contact is made) within the period specified.

REVIEW INSTRUCTIONS:

- A. Please review the document carefully. If the proposal has been reviewed earlier (i.e. if the document is a federal Final EIS or a state supplement), please consider whether your earlier comments have been adequately addressed.
- B. Prepare your agency's comments in a form which would be acceptable for responding directly to a project proponent agency.
- C. Use your agency stationery or the space below for your comments. IF YOU USE THE SPACE BELOW, THE FORM MUST BE SIGNED AND DATED.

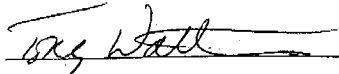
Please return your comments to:

MS. ELLIE IRONS  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
OFFICE OF ENVIRONMENTAL IMPACT REVIEW  
629 EAST MAIN STREET, SIXTH FLOOR  
RICHMOND, VA 23219  
FAX #804/698-4319

  
Ellie L. Irons  
EIR Program Manager

COMMENTS

No activities described that fall under our agency's regulatory or management programs.

(signed)  (date) 6-21-99  
(title) Deputy Chief, Habitat Management  
(agency) Virginia Marine Resources Commission

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 MICHAEL P. MURPHY  
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If you cannot meet the deadline, 1  
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 received (or contact is made) with

Post-It* Fax Note	7871	Date	6/16/99	Page	1
To	Ellie Irons	From	Tom Mizell		
Co./Dept.		Co.			
Phone #		Phone #			
Fax #		Fax #			

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 DEPARTMENT OF ENVIRONMENTAL QUALITY  
 OFFICE OF ENVIRONMENTAL IMPACT REVIEW  
 629 EAST MAIN STREET, SIXTH FLOOR  
 RICHMOND, VA 23219  
 FAX #804/698-4319

Ellie Irons  
 Ellie L. Irons  
 EIR Program Manager

COMMENTS

No Comments

(signed) Charles T. Mizell Jr. (date) 6/16/99  
 (title) Water Resources Development Manager  
 (agency) Valley Regional Office DEQ

PROJECT # 99-049F

8/98

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VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY  
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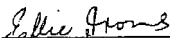
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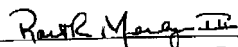
Please return your comments to:

MS. ELLIE IRONS  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
OFFICE OF ENVIRONMENTAL IMPACT REVIEW  
629 EAST MAIN STREET, SIXTH FLOOR  
RICHMOND, VA 23219  
FAX #804/698-4319

  
Ellie L. Irons  
EIR Program Manager

COMMENTS

*We have no comments.*

(signed)  (date) 6/9/99  
(title) Deputy Executive Director  
(agency) VIRGINIA PORT AUTHORITY

PROJECT # 99-042F

8/98

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